

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

**MOHAMAD FARAH, individually and
on behalf of similarly situated persons,**

Plaintiff,

v.

LOGISTICARE SOLUTIONS, LLC,

Defendant.

Case No. 4:20-cv-00578-RK

JOINT MOTION TO AMEND PROTECTIVE ORDER

Plaintiff Mohamad Farah, individually and on behalf of similarly situated persons, and Defendant ModivCare Solutions, LLC, f/k/a LogistiCare Solutions, LLC (“Defendant”), jointly move this Court to amend their Protective Order (Doc. 85) governing this lawsuit. In support of their Joint Motion to Amend Protective Order, the Parties state as follows:

1. The Parties’ Agreed Protective Order (Doc. 85) was entered on March 25, 2021.
2. Defendant anticipates producing certain documents related to the Opt-in Plaintiffs in this matter that contain non-public confidential information, the disclosure of which to Plaintiff or other Opt-in Plaintiffs may violate the privacy of the Opt-in Plaintiffs or third parties who have not authorized public disclosure.
3. As a result, the Parties wish to amend the existing Protective Order to add a category of protected, confidential information designated as Limited Disclosure Confidential Information, as defined in Section 2 of their proposed Agreed Amended Protective Order submitted herewith.
4. The parties have conferred and approve the form of the Agreed Amended Protective Order submitted to the Court.

WHEREFORE, the Parties respectfully request this Court grant their motion to amend the current Agreed Protective Order and enter their proposed Agreed Amended Protective Order to govern this case.

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CERTIFICATE OF SERVICE

The undersigned certifies that on the 4th day of April 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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